

BEFORE THE
VETERINARY MEDICAL BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Statement of Issues
Against:

JESSICA MARIE SALGADO

Registered Veterinary Technician License

Respondent.

Case No. IA 2014 31

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the
Veterinary Medical Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on

July 29, 2015

It is so ORDERED

June 29, 2015

Mark E. King, DVM
FOR THE VETERINARY MEDICAL BOARD
DEPARTMENT OF CONSUMER AFFAIRS

1 KAMALA D. HARRIS
Attorney General of California
2 THOMAS RINALDI
Supervising Deputy Attorney General
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8 **BEFORE THE**
VETERINARY MEDICAL BOARD
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA
10

11 In the Matter of the Statement of Issues
Against:

12 **JESSICA MARIE SALGADO**

13 **Registered Veterinary Technician License**

14 Respondent.
15

Case No. IA 2014 31

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

16
17 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
18 entitled proceedings that the following matters are true:

19 **PARTIES**

20 1. Annemarie Del Mugnaio ("Complainant") is the Executive Officer of the Veterinary
21 Medical Board, Department of Consumer Affairs. She brought this action solely in her official
22 capacity and is represented in this matter by Kamala D. Harris, Attorney General of the State of
23 California, by Heather Vo, Deputy Attorney General.

24 2. Respondent Jessica Marie Salgado ("Respondent") is representing herself in this
25 proceeding and has chosen not to exercise her right to be represented by counsel.

26 3. On or about October 10, 2013, Respondent filed an application dated October 1,
27 2013, with the Veterinary Medical Board to obtain a Registered Veterinary Technician License.
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5. A copy of Statement of Issues No. IA 2014 31 is attached as exhibit A and incorporated herein by reference.

6. Respondent has carefully read, and understands the charges and allegations in Statement of Issues No. IA 2014 31. Respondent has also carefully read, and understands the effects of this Stipulated Settlement and Disciplinary Order.

8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

9. Respondent admits the truth of each and every charge and allegation in Statement of Issues No. IA 2014 31.

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1 **1. Obey All Laws.**

2 Respondent shall obey all federal and state laws and regulations substantially related to the
3 practice of veterinary medicine. Further, within thirty (30) days of any arrest or conviction.

4 Respondent shall report to the Board and provide proof of compliance with the terms and
5 conditions of the court order including, but not limited to, probation and restitution requirements.

6 **2. Quarterly Reports and Interviews**

7 Respondent shall report quarterly to the Board or its designee, under penalty of perjury, on
8 forms provided by the Board, stating whether there has been compliance with all terms and
9 conditions of probation. In addition, the Board at its discretion may request additional in-person
10 reports of the probationary terms and conditions. If the final written quarterly report is not made
11 as directed, the period of probation shall be extended until such time as the final report is received
12 by the Board. Respondent shall make available all patient records, hospital records, books, logs,
13 and other documents to the Board, upon request.

14 **3. Cooperation with Probation Surveillance**

15 Respondent shall comply with the Board's probation surveillance program. All costs for
16 probation monitoring and/or mandatory premises inspections shall be borne by Respondent.
17 Probation monitoring costs are set at a rate of \$100 per month for the duration of the probation.
18 Respondent shall notify the Board of any change of name or address or address of record within
19 thirty (30) days of the change. Respondent shall notify the Board immediately in writing if
20 Respondent leaves California to reside or practice in another state. Respondent shall notify the
21 Board immediately upon return to California.

22 **4. No Preceptorships or Supervision of Interns**

23 Respondent shall not supervise a registered intern and shall not perform any of the duties of
24 a preceptor.

25 **5. Notice to Employers**

26 Respondent shall notify all present and prospective employers of the decision in this case
27 and the terms, conditions, and restrictions imposed on Respondent by the decision in this case.
28 Within thirty (30) days of the effective date of this decision and within fifteen (15) days of

Respondent undertaking new employment, Respondent shall cause her employer to report to the Board in writing, acknowledging the employer has read the Accusation and decision in this case and understands Respondent's terms and conditions of probation. Relief veterinarians shall notify employers immediately.

6. Notice to Employees

Respondent shall, upon or before the effective date of this decision, post or circulate a notice which actually recites the offenses for which Respondent has been disciplined and the terms and conditions of probation, to all registered veterinary employees, and to any preceptor, intern or extern involved in her veterinary practice. Within fifteen (15) days of the effective date of this decision, Respondent shall cause her employees to report to the Board in writing, acknowledging the employees have read the Accusation and decision in the case and understand Respondent's terms and conditions of probation.

7. Owners and Officers (Corporations or Partnerships): Knowledge of the Law

Respondent shall provide, within thirty (30) days after the effective date of the decision, signed and dated statements from the owners, officers, or any owner or holder of ten percent (10%) or more of the interest in Respondent or Respondent's stock, stating said individuals have read and are familiar with federal and state laws and regulations governing the practice of veterinary medicine.

8. Tolling of Probation

If Respondent resides out of state upon or after effective date of the decision, she must comply with the following conditions only: quarterly reports and interviews, tolling of probation, continuing education and cost recovery. If Respondent returns to California she must comply or be subject to all probationary conditions for the period of probation.

Respondent, during probation, shall engage in the practice of veterinary medicine in California for a minimum of twenty-four (24) hours per week for six (6) consecutive months or as determined by the Board. Should Respondent fail to engage in the practice of veterinary medicine in California as set forth above, the time outside of the practice shall not apply to reduction of the probationary terms.

1 **9. Violation of Probation**

2 If Respondent violates probation in any respect, the Board, after giving Respondent notice
3 and the opportunity to be heard, may revoke probation and carry out the disciplinary order that
4 was stayed. If an accusation or petition to revoke probation is filed against Respondent during
5 probation, or if the Attorney General's office has been requested to prepare any disciplinary
6 action against Respondent's license, the Board shall have continuing jurisdiction until the matter
7 is final, and the period of probation shall be extended until the matter is final.

8 **10. Completion of Probation**

9 All costs for probation monitoring and/or mandatory premises inspections shall be borne by
10 Respondent. Failure to pay all costs due shall result in an extension of probation until the matter
11 is resolved and costs paid. Upon successful completion of probation and all payment of all fees
12 due, Respondent's license will be fully restored.

13 **11. Limitation on Practice/Inspections**

14 During probation, Respondent is prohibited from the following:

15 Practicing veterinary medicine from a location or mobile veterinary practice which does not
16 have a current premises permit issued by the Board.

17 **12. No Ownership**

18 Respondent shall not have any legal or beneficial interest in any business, firm, partnership,
19 or corporation currently or hereinafter licensed or registered by the Board and shall not own any
20 veterinary hospital.

21 **13. No Management or Administration**

22 Respondent shall not manage or be the administrator of any veterinary hospital.

23 **14. Submit to Drug Testing**

24 Respondent shall immediately submit to drug testing, at Respondent's cost, upon request by
25 the Board or its designee. There will be no confidentiality in test results; positive test results will
26 be immediately reported to the Board and to Respondent's current employer.

27 **15. Abstain from Controlled Substances**

28 Respondent shall completely abstain from the personal use or possession of controlled

1 substances, as defined in the California Uniform Controlled Substances Act, and dangerous drugs
2 as defined in Section 4211 of the Business and Professions Code, except when lawfully
3 prescribed by a licensed practitioner for a bona fide illness. Respondent shall submit to random
4 drug testing during the period of probation.

5 **16. Abstention from Alcohol Use**

6 Respondent shall abstain completely from the use of alcoholic beverages.

7 **ACCEPTANCE**

8 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the
9 stipulation and the effect it will have on my Registered Veterinary Technician License. I enter
10 into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently,
11 and agree to be bound by the Decision and Order of the Veterinary Medical Board.

12
13
14 DATED: _____

Signature page attached

15 **JESSICA MARIE SALGADO**
16 Respondent

17 **ENDORSEMENT**

18 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
19 submitted for consideration by the Veterinary Medical Board.

20
21 Dated:

Respectfully submitted,

22 KAMALA D. HARRIS
Attorney General of California
23 THOMAS RINALDI
Supervising Deputy Attorney General

24
25 HEATHER VO
26 Deputy Attorney General
27 Attorneys for Complainant

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DATED: 3/16/15

JESSICA MARIE SALGADO
Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Veterinary Medical Board.

Dated: March 20, 2015

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
THOMAS RINALDI
Supervising Deputy Attorney General

Heather Vo

HEATHER VO
Deputy Attorney General
Attorneys for Complainant